PROJECT NAVIGATOR, LTD.

November 18, 2008

Mr. Philip Allen
Remedial Project Manager
USEPA
1445 Ross Ave.
Suite 1200
Dallas, TX 75202-2733

RE: Response to Comments on Draft Mixing Zone Evaluation Work Plan
Patrick Bayou Superfund Site – Deer Park, TX

Dear Mr. Allen:

On behalf of the Patrick Bayou Joint Defense Group (JDG) and pursuant to the Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigation/Feasibility Study (RI/FS) at the Patrick Bayou Superfund Site in Deer Park, TX, attached please find the JDG responses to comments on the Mixing Zone Evaluation Work Plan. Should you have any questions please feel free to contact me at 919-435-0934.

Sincerely,

s/R Piniewski

Robert Piniewski
Project Coordinator

cc: Patrick Bayou JDG
Attached list

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Response to Comments on Mixing Zone Evaluation Work Plan Patrick Bayou Superfund Site – Deer Park, TX		
Comment Source	**Comment**	**Response to Comment**
Charles D. Stone, P.G., P.E. Technical Support Section TCEQ Technical Review Draft Mixing Zone Evaluation Work Plan, Patrick Bayou Superfund Site Remedial Investigation, Deer Park, Texas October 2008.	Mr. Stone outlined the document and sought resolution of the following concern: *"Therefore, grain-size distributions from the high-resolution cores seem essential to satisfying the intent expressed in Items A.2 and B.3 (above). As such, it is recommended that grain-size distribution analysis be added to the analytical schedule for the high-resolution cores.* *While it is not necessary to perform these analyses in all samples at all depths, it is recommended that the grain-size distribution analyses be performed at locations within the model domain that have been identified as critical and at various depths. The quantity of grain-size analyses should be sufficient to facilitate model calibration of the bed load simulation to more confidently predict the course of ecological restoration."*	During the initial Remedial Investigation work, approximately 16 locations were analyzed for grain-size distribution. In addition, grain-size distribution was evaluated at 12 locations during the sed-flume work performed as part of the Supplemental RI Work Plan. The 16 locations were analyzed for grain-size distribution as follows: • From the 0 to 11 cm interval, grain-size was analyzed on the 0-2 cm sample • Below 11 cm, 30 cm composites were collected and analyzed for grain-size. The comprehensive list of analytes and volume requirements for the 0-11 cm interval precluded grain size analyses of the entire interval in this phase of work. The 12 core locations in the sed-flume work composited two sample intervals, 0-5 cm and 5-10 cm. As a supplement to the analysis specified in the Mixing Zone Evaluation Work Plan, Anchor will also collect a composite sample from each core location. The composite sample will be from 1 to 10 cm in depth, and be analyzed for grain-size distribution. This compositing of samples for grain-size distribution is typical of work conducted by both Anchor (RI/FS contractor) and QEA (sediment transport modeling contractor) at other, similar Superfund sites nationwide where EPA and other agencies have reviewed and approved sediment transport models. This resolution of grain size is appropriate for input to the sediment transport model. We believe this data is sufficient and appropriate and will facilitate proper model calibration and use of the sediment transport model.

Comment Source	Comment	Response to Comment
Barry L. Forsythe, Ph.D. U.S. Fish & Wildlife Service Liaison to USEPA Region VI 1445 Ross Ave., Suite 1200, 6SF-T Dallas, TX 75202 Email November 17, 2008	*Table 3: Why was there not a MSD proposed for Mercury samples?*	Per the Work Plan we will collect and analyze the appropriate Matrix Spike Duplicates and duplicates. The work plan calls for a minimum 5% duplicates on all bulk chemistry samples (including mercury).
	Why were there no duplicates proposed for the following analytes: PCBs, SVOCs, PAHs?	There are duplicates proposed. The Work Plan states: "Per the RI Work Plan QAPP (Anchor 2007a), field duplicates will be sampled and submitted for analysis at a frequency of 5 percent of samples submitted for bulk sediment chemistry and radiochemistry."
	Table 5: There was not a sample container listed for Mercury, rather "Same as Metals" (Mercury should be at a minimum amber jar to reduce possible volatilization)	We have contacted two labs and an outside expert in mercury analyses and they are not familiar with the amber jar and volatilization issue. It is not standard or called for in EPA Methods 1630 or 1631.
	Figure 2: I think you answered this during the meeting, but some explanation as to the rationale for selecting the locations for the "grab" samples at the mouth of the bayou. Was this location just to fill a data gap from previous sampling events? If so, I understand. If not, then I need clarification how collecting all of these samples from single area will correlate with the sediment cores (as to physical factors).	The sample locations in question, near the mouth of the Bayou are being collected to fill a data gap for grain size in this area. The model indicates that this may be an area where coarser sized materials accumulate; however, there are no grain size data to validate this finding from previous investigations.

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Mixing Zone Evaluation Work Plan

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